

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
UNITED STATES OF AMERICA	:	
	:	
-v.-	:	19 Cr. 366 (LGS)
	:	
STEPHEN M. CALK,	:	
	:	
Defendant.	:	
-----X	:	

**NOTICE OF MOTIONS *IN LIMINE***

PLEASE TAKE NOTICE, that based upon the accompanying memorandum of law, the United States of America, by and through its undersigned counsel, hereby respectfully moves this Court *in limine* for orders (1) excluding the testimony of the defense expert Dr. Andrew Carron; (2) precluding evidence or argument that the quality of the loans, or fraud against the defendant, are defenses to the charged bribery offense; (3) precluding evidence or argument concerning the defendant's prior commission of "good acts"; (4) precluding evidence of irrelevant facts intended to elicit juror sympathy; and (5) precluding evidence or argument that the charges against the defendant are politically or otherwise improperly motivated.

The Government respectfully requests oral argument on its motions.

Dated: New York, New York  
October 23, 2020

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney

By: /s/  
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